



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 6**

**1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733**

November 2, 2012

Padre Island National Seashore  
Superintendent Joe Escoto  
P.O. Box 181300  
Corpus Christi, TX 78480-1300

SUBJECT: Environmental Assessment for Rehabilitation of Main Park Road at Padre Island National Seashore

Dear Superintendent Escoto,

The Environmental Protection Agency (EPA) Region 6 has received your correspondence dated October 3, 2012 requesting comments. Our comments are provided in accordance with the National Environmental Policy Act and Section 309 of the Clean Air Act.

We have identified the following areas of concern that should be addressed in the Draft Environmental Assessment (DEA):

- Project area is within the 100 year floodplain; coordination with the local floodplain administrator is required;
- Project area is within 1,000 meters of the Dunn Ranch Novillo Line Camp National Historic Site; coordination with the State Historic Preservation Officer is recommended;
- Drainage improvement work and culvert installation in or near jurisdictional wetlands would require coordination with the U.S. Army Corps of Engineers;
- Vegetation within the study area should be characterized and quantified using the Texas Parks and Wildlife's "Vegetation Types of Texas" or another accepted vegetation classification system which recognizes State and Global rare vegetation;
- Construction should avoid and minimize adverse impacts to the aquatic ecosystem and provide compensatory mitigation for all unavoidable direct, secondary, and cumulative adverse impacts; and
- Cumulative Impact Analysis - 40 CFR §1508.7 states "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." EPA strongly suggests you refer to the Council on Environmental Quality's "Considering Cumulative Effects Under the National Environmental Policy Act"<sup>1</sup> and EPA's "Consideration Of Cumulative Impacts in EPA Review of NEPA Documents"<sup>2</sup> for assistance with identifying appropriate temporal and

<sup>1</sup> <http://ceq.hss.doe.gov/nepa/ccenepa/ccenepa.htm>

<sup>2</sup> <http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf>

spatial boundaries and identifying appropriate past, present, and reasonably foreseeable future projects to include in the analysis.

We appreciate the opportunity to review this request. Please send a copy of the completed DEA to 1445 Ross Avenue, Suite 1200, Dallas, TX 75202 to my attention. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or [macfarlane.john@epa.gov](mailto:macfarlane.john@epa.gov) should you have any questions or concerns regarding this letter.

Sincerely,  


Rhonda Smith  
Chief, Office of Planning and  
Coordination